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April 18, 2013

Via Messenger Delivery

Honorable John Tharp
United States District Court
Northern District of Illinois
Eastern Division
219 South Dearborn, Room 1418
Chicago, Illinois 60604

Re: *Adriana M. Castro, et al. v. Sanofi Pasteur Inc.*
Case No. 13-cv-2086

Judge Tharp:

Should the Court deem it necessary or helpful in ruling on the pending motion, Plaintiffs hereby submit for *in camera* review a representative selection of the documents at issue with respect to Section C of Plaintiffs' Memorandum in Support of Motion for Reconsideration of the Court's April 9, 2013 Order [Doc. No. 22 at 6-9].¹ As noted in the papers, these documents typify the type of materials reflecting mental impressions that we believe are (a) not relevant to Sanofi's purported conspiracy theory, and (b) should be protected from discovery by Defendant. We are prepared, at the Court's direction, to promptly submit for *in camera* review all documents that Plaintiffs believe should be protected from disclosure in response to Defendants' subpoena to Navigant Consulting, should the Court deem such a procedure necessary to resolve the pending matter.²

Very truly yours,

/s/ Scott F. Hessell

Enclosures

Filed via ECF to All Counsel of Record (w/o enclosure)

¹ Plaintiffs' counsel mentioned during today's telephonic hearing that there were documents available for the Court's *in camera* review related to Plaintiffs' motion. [See April 18, 2013 Transcr., at 4:22-5:4.]

² Plaintiffs also note Defendant's suggestion that Plaintiffs submit documents reflecting mental impressions to the Court for *in camera* review. [Doc. No. 27 at p. 8, n.9].